

September 28, 2020

By ECF

Hon. Lorna G. Schofield
United States District Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Natural Alternatives International, Inc. v. Bactolac Pharmaceutical, Inc., et al.*,
No. 1:19-cv-05354(LGS)

Dear Judge Schofield:

This joint letter is submitted by counsel for plaintiff, Natural Alternatives International, Inc. (“NAI”), and defendant, Bactolac Pharmaceutical, Inc. (“Bactolac”), pursuant to the Third Amended Case Management Plan and Scheduling Order (Dkt. No. 97). NAI apologizes for this report being one business day late because of a technology issue.

As to discovery from Bactolac, it has made several additional productions totaling 886 pages of documents in response to NAI’s requests. Bactolac will continue to produce documents on a rolling basis.

As set forth in the last report to the Court, NAI has provided its counsel with a substantial hard drive of documents potentially responsive to Bactolac’s requests. NAI has produced additional responsive documents to Bactolac. This production includes native Excel spreadsheets. NAI will continue to produce documents on a rolling basis.

The parties agree that the ongoing restrictions imposed due to the pandemic and staffing issues continue to hamper our respective clients’ ability to make significant progress on document discovery. The parties wish to apprise the Court that we likely will not complete document discovery until October 31, 2020. The parties are still working to complete depositions by December 2, 2020, the date set forth in the Court’s third amended schedule. This belief is based on the current state of the pandemic, however.

There are no motions currently pending.

We again thank the Court for its attention and consideration.

Respectfully submitted,

/s/ Richard J. Oparil
Richard J. Oparil
Counsel for Plaintiff

/s/ Christopher A. Raimondi
Christopher A. Raimondi
Counsel for Defendant